

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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| In Re Application |) | |
| No. 09/965,187 |) | For: METHOD AND SYSTEM FOR |
| |) | OPTIMIZING SYSTEM-ACCESS |
| |) | AND SOFT-HANDOFF |
| Samir S. Soliman |) | PARAMETERS BASED ON |
| |) | LOCATION INFORMATION |
| Examiner: Melur Ramakrishnaiah |) | |
| |) | |
| Filed: September 25, 2001 |) | Group No. 2614 |

REPLY UNDER 37 C.F.R. § 1.111 – REQUEST TO REOPEN PROSECUTION

Mail Stop Amendment
 Commissioner for Patents
 P.O. Box 1450
 Alexandria, VA 22313-1450

Dear Commissioner:

This paper is being filed in reply to the Examiner's Answer that was mailed on December 13, 2007. This reply, which is being filed under the provisions of 37 CFR § 1.111, should be interpreted as a request to reopen prosecution in connection with the above-identified application. Please amend the above-identified application as indicated below.

CERTIFICATE OF ELECTRONIC TRANSMISSION (37 CFR 1.8)

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| Date: | February 13, 2008 |
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PENDING CLAIMS AS AMENDED

This listing of claims will replace all prior versions, and listings, of claims in the application:

1. (Currently Amended) A wireless communication system comprising:
a first transceiver;
a second transceiver;
a third transceiver in communication with the first transceiver; and
a controller configured to effectuate a soft handoff from the first transceiver to the second transceiver using a set of optimum parameters that are determined based on a current position of the third transceiver, wherein the optimum parameters depend on geographical characteristics of an area in which the third transceiver is positioned.
2. (Original) The system of claim 1 wherein the controller is further configured to determine the current position of the third transceiver.
3. (Original) The system of claim 2, wherein the current position includes a position of a sector within a cell coverage area.
4. (Currently Amended) The system of claim 1 wherein the set of optimum parameters includes a set of optimum system-access parameters and a set of optimum soft-handoff parameters, wherein the system-access parameters are used to control the performance of a mobile unit comprising the third transceiver when the mobile unit is operating in a system access state.
5. (Original) The system of claim 4 wherein the controller is further configured to determine the set of optimum soft-handoff parameters.
6. (Original) The system of claim 4 wherein the controller is further configured to determine the set of optimum system-access parameters.

7. (Currently Amended) A mobile unit comprising:
 - a receiver unit configured to receive a set of optimum system-access parameters determined based on a current position of the mobile unit; and
 - a controller configured to effectuate a soft handoff of the mobile unit based on the received set of optimum system-access parameters, wherein the optimum system-access parameters depend on geographical characteristics of an area in which the mobile unit is positioned.
8. (Currently Amended) A mobile unit comprising:
 - a receiver unit configured to receive a set of optimum soft-handoff parameters determined based on a current position of the mobile unit; and
 - a controller configured to effectuate a soft handoff from a first base station to a second base station based on the received set of optimum soft-handoff parameters, wherein the optimum soft-handoff parameters depend on geographical characteristics of an area in which the mobile unit is positioned.
9. (Original) The mobile unit of claim 8 wherein the controller is further configured to determine the current position of the mobile unit.
10. (Original) The mobile unit of claim 9 wherein the current position includes a position of a cell coverage area.
11. (Original) The mobile unit of claim 9 wherein the current position includes a position of a sector within a cell coverage area.
12. (Original) The mobile unit of claim 8 wherein the receiver unit is further configured to receive a set of optimum system-access parameters determined based on the current position of the mobile unit.

13. (Original) The mobile unit of claim 12 further comprising means for controlling the performance of the mobile unit based on the received set of optimum system access parameters.
14. (Currently Amended) A base station comprising:
a transmitter unit configured to transmit a set of optimum system-access parameters determined based on a current position of a mobile unit; and
a controller configured to effectuate a soft handoff of the mobile unit based on the set of optimum system-access parameters, wherein the optimum system-access parameters depend on geographical characteristics of an area in which the mobile unit is positioned.
15. (Currently Amended) A base station comprising:
a transmitter unit configured to transmit to the mobile unit a set of optimum soft-handoff parameters determined based on a current position of the mobile unit in a first coverage area; and
a controller configured to effectuate a soft handoff from the first coverage area to a second coverage area based on the set of optimum soft-handoff parameters, wherein the optimum soft-handoff parameters depend on geographical characteristics of an area in which the mobile unit is positioned.
16. (Original) The base station of claim 15 wherein the controller is further configured to determine the current position of the mobile unit in the first coverage area.
17. (Original) The base station of claim 15 wherein the first coverage area includes a cell coverage area.
18. (Original) The base station of claim 15 wherein the first coverage area includes a sector within a cell coverage area.
19. (Original) The base station of claim 15 wherein the controller is further configured to determine the set of soft-handoff parameters.

20. (Original) The base station of claim 15 wherein the transmitter unit is further configured to transmit a set of optimum system-access parameters determined based on the current position of the mobile unit in a first coverage area.

21. (Original) The base station of claim 20 wherein the controller is further configured to control the performance of the mobile unit based on the set of optimum system-access parameters.

22. (Original) The base station of claim 21 wherein the controller is further configured to determine the set of optimum soft-handoff parameters and a set of optimum system-access parameters.

23. (Currently Amended) A method for effectuating soft handoff, comprising:
determining a current position of a mobile unit in a first coverage area;
determining a set of optimum parameters based on the current position of the mobile unit;
and
effectuating a soft handoff from the first coverage area to a second coverage area using the set of optimum parameters, wherein the optimum parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

24. (Original) The method of claim 23 wherein the determining the set of optimum parameters includes determining a set of optimum system-access parameters and determining a set of optimum soft-handoff parameters.

25-31. (Withdrawn)

32. (Currently Amended) ~~A computer-readable medium embodying a method~~ A computer-program product for effectuating soft handoff, the method comprising: the computer-program product comprising a computer-readable medium having instructions thereon, the instructions comprising:

code for determining a current position of a mobile unit in a first coverage area;
code for determining a set of optimum parameters based on the current position of the mobile unit; and
code for effectuating a soft handoff from the first coverage area to a second coverage area using the set of optimum parameters, wherein the optimum parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

33-34. (Withdrawn)

35. (Currently Amended) An apparatus for effectuating soft handoff, comprising:
means for determining a current position of a mobile unit in a first coverage area;
means for determining a set of optimum parameters based on the current position of the mobile unit; and
means for effectuating a soft handoff from the first coverage area to a second coverage area using the set of optimum parameters, wherein the optimum parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

36. (Currently Amended) An apparatus for effectuating soft handoff, comprising:
- a memory unit; and
 - a digital signal processing (DSP) unit communicatively coupled to the memory unit, the DSP being capable of:
 - determining a current position of a mobile unit in a first coverage area;
 - determining a set of optimum parameters based on the current position of the mobile unit;
- and
- effectuating a soft handoff from the first coverage area to a second coverage area using the set of optimum parameters, wherein the optimum parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

37-44. (Withdrawn)

REMARKS

Claims 1-24, 32 and 35-36 stand rejected under 35 U.S.C. § 103(a). Reconsideration is respectfully requested in view of the above amendments to the claims and the following remarks.

I. Claims 1-3, 7, 8-11, 14, 15-19, 23, 32 and 35-36 Rejected Under 35 U.S.C. § 103(a)

Claims 1-3, 7, 8-11, 14, 15-19, 23, 32 and 35-36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over PCT Patent Application Publication No. WO 01/63960 to Raith (hereinafter, "Raith") in view of U.S. Patent No. 6,507,740 to Shi (hereinafter, "Shi"). This rejection is respectfully traversed.

The factual inquiries that are relevant in the determination of obviousness are determining the scope and contents of the prior art, ascertaining the differences between the prior art and the claims in issue, resolving the level of ordinary skill in the art, and evaluating evidence of secondary consideration. KSR Int'l Co. v. Teleflex Inc., 550 U.S. ___, 2007 U.S. LEXIS 4745, at **4-5 (2007) (citing Graham v. John Deere Co. of Kansas City, 383 U.S. 1, 17-18 (1966)). To establish a *prima facie* case of obviousness, the prior art references "must teach or suggest all the claim limitations." M.P.E.P. § 2142. Moreover, the analysis in support of an obviousness rejection "should be made explicit." KSR, 2007 U.S. LEXIS 4745, at **37. "[R]ejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." Id. (citing In re Kahn, 441 F.3d 977, 988 (Fed. Cir. 2006)).

Claim 1, as amended above, recites:

A wireless communication system comprising:

a first transceiver;

a second transceiver;

a third transceiver in communication with the first transceiver; and

a controller configured to effectuate a soft handoff from the first transceiver to the second transceiver using a set of optimum parameters that are determined based on a current position of the third transceiver, wherein the optimum parameters depend on geographical characteristics of an area in which the third transceiver is positioned.

Support for the amendments that have been made to claim 1 may be found in paragraphs [0007], [0078], and [0080] of Applicant's specification.

Applicant respectfully submits that the cited references do not teach or suggest all of the subject matter of claim 1. For example, the cited references do not teach or suggest "wherein the optimum parameters depend on geographical characteristics of an area in which the third transceiver is positioned," as recited in claim 1.

The Examiner asserts that "Raith discloses ... a controller ... configured to effectuate a handoff from the first transceiver to the second transceiver using a set of optimum parameters." Examiner's Answer, page 3. However, Raith does not teach or suggest "wherein the optimum parameters depend on geographical characteristics of an area in which the third transceiver is positioned," as recited in claim 1.

Raith states: "[I]f the mobile communication network was provided with the location of the mobile terminal, the mobile communication network could use this information for a variety of purposes, such as to optimize handovers." Raith, page 4, lines 1-4. However, Raith's reference to "the location of the mobile terminal" does not teach or suggest anything about "parameters" that "depend on the geographical characteristics of an area in which the [mobile terminal] is positioned," as recited in claim 1. The "location of the mobile terminal" does not necessarily provide any information about the "geographical characteristics of an area in which the [mobile terminal] is positioned."

Raith also states: "The mobile communication network 10 may use position information provided by the mobile terminal 20 for a variety of purposes." Raith, page 9, lines 14-15. However, Raith's reference to "position information provided by the mobile terminal" does not teach or suggest anything about "parameters" that "depend on the geographical characteristics of an area in which the [mobile terminal] is positioned," as recited in claim 1. Receiving "position information provided by the mobile terminal," as stated in Raith, does not necessarily provide any information about the "geographical characteristics of an area in which the [mobile terminal] is positioned."

Raith also states:

[P]osition and velocity of the mobile terminal 20 may be used to help determine the optimum time for a handover while the mobile terminal 20 is engaged a call. The mobile communication network 10 may also use

position information to determine which channels to include in the neighbor list transmitted to the mobile terminal 20, to determine the route traveled by the mobile terminal 20, and to determine the optimum location along a route at which to execute the handover.

Raith, page 9, lines 15-21. This does not teach or suggest the claimed subject matter at issue. This portion of Raith refers to several examples of ways in which the “position ... of the mobile terminal 20 may be used.” However, Raith does not teach or suggest any relationship between any of these examples and the “geographical characteristics of an area in which the [mobile terminal] is positioned,” as recited in claim 1. Raith does not explicitly refer to “geographical characteristics” of any kind. In addition, none of the listed examples necessarily relate to “geographical characteristics of an area in which [a mobile terminal] is positioned,” as recited in claim 1.

Because Raith does not teach or suggest anything about “parameters” that “depend on geographical characteristics of an area in which the third transceiver is positioned,” it follows that Raith does not teach or suggest the use of such “parameters” “to effectuate a soft handoff,” as recited in claim 1. Raith simply does not teach or suggest this claimed subject matter.

Applicant respectfully submits that Shi also does not teach or suggest “wherein the optimum parameters depend on geographical characteristics of an area in which the third transceiver is positioned,” as recited in claim 1. The Examiner has not asserted that the claimed subject matter at issue is taught or suggested by Shi. Nor can Applicant find anything in Shi that could reasonably be construed as teaching or suggesting the claimed subject matter at issue.

In view of the foregoing, Applicant respectfully submits that claim 1 is allowable. Accordingly, Applicant respectfully requests that the rejection of claim 1 be withdrawn.

Claims 2-3 depend from claim 1. Accordingly, Applicant respectfully requests that the rejection of claims 2-3 be withdrawn for at least the same reasons as those presented above in relation to claim 1.

Claim 7, as amended above, recites:

A mobile unit comprising:

a receiver unit configured to receive a set of optimum system-access parameters determined based on a current position of the mobile unit;
and

a controller configured to effectuate a soft handoff of the mobile unit based on the received set of optimum system-access parameters, wherein the optimum system-access parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

Support for the amendments that have been made to claim 7 may be found in paragraphs [0007], [0078], and [0080] of Applicant's specification.

Applicant respectfully submits that the cited references do not teach or suggest "wherein the optimum system-access parameters depend on geographical characteristics of an area in which the mobile unit is positioned," as recited in claim 7. As discussed above, although Raith refers to using "the location of the mobile terminal" for "optimiz[ing] handoff," Raith does not teach or suggest anything about "parameters" that "depend on geographical characteristics of an area in which the mobile unit is positioned," as recited in claim 7. The "location" of a mobile unit does not necessarily provide any information about the "geographical characteristics of an area in which the mobile unit is positioned." Moreover, Shi does not teach or suggest the claimed subject matter at issue. Accordingly, Applicant respectfully submits that claim 7 is allowable, and request that the rejection of claim 7 be withdrawn.

Claim 8, as amended above, recites:

A mobile unit comprising:

a receiver unit configured to receive a set of optimum soft-handoff parameters determined based on a current position of the mobile unit; and

a controller configured to effectuate a soft handoff from a first base station to a second base station based on the received set of optimum soft-handoff parameters, wherein the optimum soft-handoff parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

Support for the amendments that have been made to claim 8 may be found in paragraphs [0007], [0078], and [0080] of Applicant's specification.

Applicant respectfully submits that the cited references do not teach or suggest "wherein the optimum soft-handoff parameters depend on geographical characteristics of an area in which the mobile unit is positioned," as recited in claim 8. As discussed above, although Raith refers to using "the location of the mobile terminal" for "optimiz[ing] handoff," Raith does not teach or suggest anything about "parameters" that "depend on geographical characteristics of an area in

which the mobile unit is positioned,” as recited in claim 8. The “location” of a mobile unit does not necessarily provide any information about the “geographical characteristics of an area in which the mobile unit is positioned.” Moreover, Shi does not teach or suggest the claimed subject matter at issue. Accordingly, Applicant respectfully submits that claim 8 is allowable, and requests that the rejection of claim 8 be withdrawn.

Claims 9-11 depend from claim 8. Accordingly, Applicant respectfully requests that the rejection of claims 9-11 be withdrawn for at least the same reasons as those presented above in relation to claim 8.

Claim 14, as amended above, recites:

A base station comprising:

a transmitter unit configured to transmit a set of optimum system-access parameters determined based on a current position of a mobile unit; and

a controller configured to effectuate a soft handoff of the mobile unit based on the set of optimum system-access parameters, wherein the optimum system-access parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

Support for the amendments that have been made to claim 14 may be found in paragraphs [0007], [0078], and [0080] of Applicant’s specification.

Applicant respectfully submits that the cited references do not teach or suggest “wherein the optimum system-access parameters depend on geographical characteristics of an area in which the mobile unit is positioned,” as recited in claim 14. As discussed above, although Raith refers to using “the location of the mobile terminal” for “optimiz[ing] handoff,” Raith does not teach or suggest anything about “parameters” that “depend on geographical characteristics of an area in which the mobile unit is positioned,” as recited in claim 14. The “location” of a mobile unit does not necessarily provide any information about the “geographical characteristics of an area in which the mobile unit is positioned.” Moreover, Shi does not teach or suggest the claimed subject matter at issue. Accordingly, Applicant respectfully submits that claim 14 is allowable, and requests that the rejection of claim 14 be withdrawn.

Claim 15, as amended above, recites:

A base station comprising:

a transmitter unit configured to transmit to the mobile unit a set of optimum soft-handoff parameters determined based on a current position of the mobile unit in a first coverage area; and

a controller configured to effectuate a soft handoff from the first coverage area to a second coverage area based on the set of optimum soft-handoff parameters, wherein the optimum soft-handoff parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

Support for the amendments that have been made to claim 15 may be found in paragraphs [0007], [0078], and [0080] of Applicant's specification.

Applicant respectfully submits that the cited references do not teach or suggest "wherein the optimum soft-handoff parameters depend on geographical characteristics of an area in which the mobile unit is positioned," as recited in claim 15. As discussed above, although Raith refers to using "the location of the mobile terminal" for "optimiz[ing] handoff," Raith does not teach or suggest anything about "parameters" that "depend on geographical characteristics of an area in which the mobile unit is positioned," as recited in claim 15. The "location" of a mobile unit does not necessarily provide any information about the "geographical characteristics of an area in which the mobile unit is positioned." Moreover, Shi does not teach or suggest the claimed subject matter at issue. Accordingly, Applicant respectfully submits that claim 15 is allowable, and requests that the rejection of claim 15 be withdrawn.

Claims 16-19 depend from claim 15. Accordingly, Applicant respectfully requests that the rejection of claims 16-19 be withdrawn for at least the same reasons as those presented above in relation to claim 15.

Claim 23, as amended above, recites:

A method for effectuating soft handoff, comprising:

determining a current position of a mobile unit in a first coverage area;
determining a set of optimum parameters based on the current position of the mobile unit; and

effectuating a soft handoff from the first coverage area to a second coverage area using the set of optimum parameters, wherein the optimum parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

Support for the amendments that have been made to claim 23 may be found in paragraphs [0007], [0078], and [0080] of Applicant's specification.

Applicant respectfully submits that the cited references do not teach or suggest “wherein the optimum parameters depend on geographical characteristics of an area in which the mobile unit is positioned,” as recited in claim 23. As discussed above, although Raith refers to using “the location of the mobile terminal” for “optimiz[ing] handoff,” Raith does not teach or suggest anything about “parameters” that “depend on geographical characteristics of an area in which the mobile unit is positioned,” as recited in claim 23. The “location” of a mobile unit does not necessarily provide any information about the “geographical characteristics of an area in which the mobile unit is positioned.” Moreover, Shi does not teach or suggest the claimed subject matter at issue. Accordingly, Applicant respectfully submits that claim 23 is allowable, and requests that the rejection of claim 23 be withdrawn.

Claim 35, as amended above, recites:

An apparatus for effectuating soft handoff, comprising:

means for determining a current position of a mobile unit in a first coverage area;

means for determining a set of optimum parameters based on the current position of the mobile unit; and

means for effectuating a soft handoff from the first coverage area to a second coverage area using the set of optimum parameters, wherein the optimum parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

Support for the amendments that have been made to claim 35 may be found in paragraphs [0007], [0078], and [0080] of Applicant’s specification.

Applicant respectfully submits that the cited references do not teach or suggest “wherein the optimum parameters depend on geographical characteristics of an area in which the mobile unit is positioned,” as recited in claim 35. As discussed above, although Raith refers to using “the location of the mobile terminal” for “optimiz[ing] handoff,” Raith does not teach or suggest anything about “parameters” that “depend on geographical characteristics of an area in which the mobile unit is positioned,” as recited in claim 35. The “location” of a mobile unit does not necessarily provide any information about the “geographical characteristics of an area in which the mobile unit is positioned.” Moreover, Shi does not teach or suggest the claimed subject matter at issue. Accordingly, Applicant respectfully submits that claim 35 is allowable, and requests that the rejection of claim 35 be withdrawn.

Claim 36, as amended above, recites:

An apparatus for effectuating soft handoff, comprising:

a memory unit; and

a digital signal processing (DSP) unit communicatively coupled to the memory unit, the DSP being capable of:

determining a current position of a mobile unit in a first coverage area;

determining a set of optimum parameters based on the current position of the mobile unit; and

effectuating a soft handoff from the first coverage area to a second coverage area using the set of optimum parameters, wherein the optimum parameters depend on geographical characteristics of an area in which the mobile unit is positioned.

Support for the amendments that have been made to claim 36 may be found in paragraphs [0007], [0078], and [0080] of Applicant's specification.

Applicant respectfully submits that the cited references do not teach or suggest "wherein the optimum parameters depend on geographical characteristics of an area in which the mobile unit is positioned," as recited in claim 36. As discussed above, although Raith refers to using "the location of the mobile terminal" for "optimiz[ing] handoff," Raith does not teach or suggest anything about "parameters" that "depend on geographical characteristics of an area in which the mobile unit is positioned," as recited in claim 36. The "location" of a mobile unit does not necessarily provide any information about the "geographical characteristics of an area in which the mobile unit is positioned." Moreover, Shi does not teach or suggest the claimed subject matter at issue. Accordingly, Applicant respectfully submits that claim 36 is allowable, and requests that the rejection of claim 36 be withdrawn.

II. Claims 4-6, 12-13, 19-22 and 24 Rejected Under 35 U.S.C. § 103(a)

Claims 4-6, 12-13, 19-22 and 24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Raith in view of Shi in further view of U.S. Patent No. 6,594,243 to Huang *et al.* (hereinafter, “Huang”). Applicant respectfully traverses.

Claims 4-6 depend from claim 1. Accordingly, Applicant respectfully requests that the rejection of claims 4-6 be withdrawn for at least the same reasons as those presented above in relation to claim 1.

In addition, Applicant respectfully submits the following additional reasons why claim 4 is allowable. Claim 4, as amended above, recites:

The system of claim 1 wherein the set of optimum parameters includes a set of optimum system-access parameters and a set of optimum soft-handoff parameters, wherein the system-access parameters are used to control the performance of a mobile unit comprising the third transceiver when the mobile unit is operating in a system access state.

Support for the amendments that have been made to claim 4 may be found in paragraphs [0006], [0011], and [0029] of Applicant’s specification.

Applicant respectfully submits that the cited references do not teach or suggest all of the subject matter of claim 4. For example, the cited references do not teach or suggest “wherein the set of optimum parameters includes a set of optimum system-access parameters,” as recited in claim 4.

The Examiner correctly acknowledges that “Reith in view of Shi ... does not specifically teach ... determining optimum system access parameters....” Examiner’s Answer, page 6. However, the Examiner asserts that “Huang discloses ... determining optimum system access parameters (for example T_ADD, T_DROP).” *Id.*, pages 6-7. Applicant respectfully disagrees. The two parameters referred to by the Examiner, T_ADD and T_DROP, are not “system access parameters.” Huang states the following about the T_ADD parameter:

Pilot Detection Threshold (T_ADD). This value is used by a mobile station, e.g., to trigger the transfer of a pilot from a neighbor set or a remaining set to a candidate set, or from the candidate set to the active set, and to trigger the sending of the Pilot Strength Measurement Message (PSMM) initiating the soft handoff process. This value is also referred to herein as an “add threshold”

Huang, col. 4, lines 39-45. Huang states the following about the T_DROP parameter:

Pilot Drop Threshold (T_DROP). This value is used by a mobile station to start a handoff drop timer for pilots in the active set and the candidate set. This value is also referred to herein as a "drop threshold"

Huang, col. 4, lines 46-49. As can be seen, Huang does not teach or suggest that these parameters "are used to control the performance of a mobile unit ... when the mobile unit is operating in a system access state," as recited in claim 4. Huang does not teach or suggest that there is any relationship between the T_ADD and T_DROP parameters and "the mobile unit ... operating in a system access state." Accordingly, Applicants respectfully submit that this is an additional reason why claim 4 is allowable, and request that the rejection of claim 4 be withdrawn.

Claims 12 and 13 depend from claim 8. Accordingly, Applicant respectfully requests that the rejection of claims 12 and 13 be withdrawn for at least the same reasons as those presented above in relation to claim 1.

Claims 19-22 depend from claim 15. Accordingly, Applicant respectfully requests that the rejection of claims 19-22 be withdrawn for at least the same reasons as those presented above in relation to claim 15.

Claim 24 depends from claim 23. Accordingly, Applicant respectfully requests that the rejection of claim 24 be withdrawn for at least the same reasons as those presented above in relation to claim 23.

III. Conclusion

Applicant respectfully submits that the present application is now in condition for allowance. If there are any remaining issues preventing allowance of the pending claims that may be clarified by telephone, the Examiner is requested to call the undersigned.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

Dated: February 13, 2008

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